

1 JAIKUMAR RAMASWAMY
 Chief, Asset Forfeiture and
 Money Laundering Section (AFMLS)
 2 DANIEL H. CLAMAN, Assistant Deputy Chief
 WOO S. LEE, Trial Attorney
 3 STEPHEN A. GIBBONS, Trial Attorney
 4 DELLA SENTILLES, Trial Attorney
 Criminal Division
 5 United States Department of Justice
 1400 New York Avenue, N.W., 10th Floor
 6 Washington, D.C. 20530
 Telephone: 202-598-2937
 7 Della.Sentilles@usdoj.gov

8
 9 ANDRÉ BIROTTE, JR.
 United States Attorney
 STEVEN R. WELK (Cal. Bar No. 149883)
 10 Assistant United States Attorney
 312 North Spring Street, 14th Floor
 11 Los Angeles, California 90012
 Telephone: (213) 894-6166
 12 Steven.Welk@usdoj.gov

13 Attorneys for Plaintiff
 14 UNITED STATES OF AMERICA

15 UNITED STATES DISTRICT COURT
 16 FOR THE CENTRAL DISTRICT OF CALIFORNIA

17 UNITED STATES OF AMERICA,) No. CV 11-3582-GW-SS
18 Plaintiff,)
19 v.) Consolidated With CV 13-9169-GW-SS
)
20 ONE WHITE CRYSTAL-COVERED “BAD)
21 TOUR” GLOVE AND OTHER MICHAEL) JOINT STATUS REPORT REGARDING
22 JACKSON MEMORABILIA;) SETTLEMENT AND JOINT MOTION
23 REAL PROPERTY LOCATED ON) AND STIPULATION TO CONTINUE
24 SWEETWATER MESA ROAD IN MALIBU,) STATUS CONFERENCE
25 CALIFORNIA; ONE 2011 FERRARI 599)
26 GTO,)
27 Defendants.)
28)

1
2 On July 18, 2014, the United States and Teodoro Nguema Obiang Mangue
3 and Sweetwater Malibu, LLC (“Claimants”) filed a Notice of Settlement and Joint
4 Motion to Stay Proceedings and Vacate Scheduled Dates (the “Joint Motion”).
5
6 ECF No. 118. The parties advised the Court that they had reached a tentative
7 agreement resolving the above-identified cases in their entirety. Id. The parties
8 further apprised the Court that “[f]inal settlement is contingent upon counsel for
9 the United States obtaining necessary internal approvals” within the Department
10 of Justice (the “Department”), and that counsel for the United States would
11 endeavor to complete the process for obtaining these approvals within thirty (30)
12 days or less. Id. Accordingly, the parties requested that the Court stay
13 proceedings and vacate the scheduled dates in the above-identified actions.
14

15
16
17 On July 28, 2014, this Court entered an order staying proceedings, vacating
18 the scheduled dates in the above-identified cases, and instructing the parties to
19 lodge an order resolving the above-referenced cases by no later than August 15,
20 2014, or to file a joint status report. ECF. No. 119. The Court further set a status
21 conference for August 21, 2014, at 8:30 A.M. Id.
22

23
24 As explained in the Joint Motion, the Department’s internal policies and
25 procedures require counsel for the United States to obtain certain internal
26 approvals, including from the Department’s Office of the Deputy Attorney
27
28

General, to execute a settlement agreement resolving the above-identified actions.

Between July 18, 2014 and the present (“Relevant Period”), counsel for the United States has endeavored to obtain the necessary approvals consistent with the Department’s policies and procedures. Multiple offices within the Department have reviewed the terms of the tentative settlement. However, the process for obtaining these approvals has been unexpectedly delayed because of the absence of certain supervisory personnel during the Relevant Period. Counsel for the United States expects that final approval of the settlement will be granted within approximately thirty (30) days or less. As such, the parties request that the Court (i) set a deadline of September 12, 2014, for the lodging of a proposed order resolving the matter or the filing of a joint status report, and (ii) continue the status conference scheduled for August 21, 2014 to September 18, 2014, at 8:30 A.M.

Respectfully submitted,

DATED: August 11, 2014

JAIKUMAR RAMASWAMY, CHIEF
ASSET FORFEITURE AND MONEY
LAUNDERING SECTION, Criminal Division

/s/ Della G. Sentilles
DANIEL H. CLAMAN, Assistant Deputy Chief
WOO S. LEE, Trial Attorney
STEVE GIBBONS, Trial Attorney
DELLA SENTILLES, Trial Attorney
Criminal Division
United States Department of Justice

1 ANDRÉ BIROTTE, JR., United States Attorney
2 STEVEN R. WELK, Assistant U.S. Attorney
3 Chief, Asset Forfeiture Section
4 KATHARINE SCHONBACHLER
5 Assistant United States Attorney
6 Attorneys for Plaintiff
7 UNITED STATES OF AMERICA

8 DATED: August 11, 2014

9 QUINN EMANUEL URQUHART &
10 SULLIVAN, LLP

11 By /s/ Brian M. Wheeler
12 Duane R. Lyons
13 Brian M. Wheeler
14 Attorneys for Claimants Teodoro Nguema
15 Obiang Mangué and Sweetwater Malibu, LLC
16
17
18
19
20
21
22
23
24
25
26
27
28